

# Exhibit P

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1 SUPERIOR COURT OF NEW JERSEY  
2 LAW DIVISION - MIDDLESEX COUNTY  
3 DOCKET NO. MID-L-003809-18AS  
4

5 KAYME A. CLARK and VIRTUAL  
6 DUSTIN W. CLARK, DEPOSITION UPON  
7 Plaintiffs, ORAL EXAMINATION  
8 v. OF WILLIAM E. LONGO  
9 Defendants.  
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12  
13 TRANSCRIPT of the stenographic notes  
14 of ANDREA F. NOCKS, a Certified Court Reporter and  
15 Certified Realtime Court Reporter of the State of  
16 New Jersey, Certificate No. XI01573, taken virtually  
17 on April 2, 2024, commencing at 11:18 a.m., Eastern  
18 Standard Time.  
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22  
23  
24  
25 Job No. 6625014

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1 A. Correct.

2 Q. And then one thing your lab  
3 mentioned -- or you mentioned back in this report in  
4 February 2020, that you were still working on the  
5 heavy liquid density for chrysotile asbestos and by  
6 TEM.

7 And it's still true that your lab has  
8 not analyzed the Johnson & Johnson Baby Powder  
9 sample and reported results of chrysotile by TEM  
10 using that method to date, right?

11 A. Correct.

12 Q. Okay. Then we go to Colley, which  
13 I've marked. It's an April 6, 2020, report. M71046  
14 is another --

15 A. I'm sorry. M71046?

16 Q. Right.

17 A. '46. What is that, 20- -- 2020?

18 Q. Yes, sir.

19 A. Okay. Thank you.

20 Q. You're welcome.

21 And I guess I should mention just  
22 briefly, if we go back to the Zimmerman report that  
23 was on a container, one of the containers in that  
24 report was dated from 1994, right?

25 A. Correct.

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## CERTIFICATE OF OFFICER

I CERTIFY that the foregoing is a true and accurate transcript of the testimony and proceedings as reported stenographically by me at the time, place and on the date as hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney or counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

Andrea Nodis CCR CRR

ANDREA NOCKS, CCR, CRR

Certificate No. X100157300

Certificate No. XR00011300